

Dee May
Director
Federal Regulatory Issues

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NYNEX

September 18, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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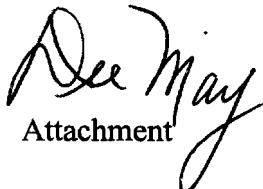
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: CC 96-98/Implementation of the Local Competition Provisions in the Telecommunications Act of 1996 and CC 95-185

Mr. Saul Fisher, Mr. Don Evans, Ms. Thea Snyder, Ms. Deborah Haraldson and I met with Mr. Richard Welch, Mr. Kalpak Gude, Mr. Paul Gallant and Mr. David Ellen of the Policy Division of the Common Carrier Bureau today as a follow up to a call conducted on September 12. The purpose of the meeting was to discuss the NYNEX effort to implement mechanized Operational Support Systems to support Interconnection requirements. NYNEX presented an overview (see attachment) that reviewed our efforts prior to the FCC's interconnection order, the impact of the order on the original assumptions and associated implementation timelines, current assumptions based on the FCC's order, NYNEX's planning implementation timeline and a status report.

Please contact me if you have any questions.

Sincerely,


Attachment

cc: R. Metzger
R. Welch
D. Ellen
P. Gallant
K. Gude
D. Stockdale

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TELECOMMUNICATIONS ACT OF 1996 NYNEX OPERATIONAL READINESS

**Discussion with the FCC
on September 18, 1996**

Thea Snyder

AGENDA

- Plan Before the August FCC Order
 - Perspective
 - Mechanized Interface Architecture
 - Major Impacts on Operating Personnel
 - Original Schedule
- Impact of August Order
- Current Schedule
- Planned Customer Support For Retailers
 - Preparation: Resources, Staffing, Training

OPERATIONAL READINESS

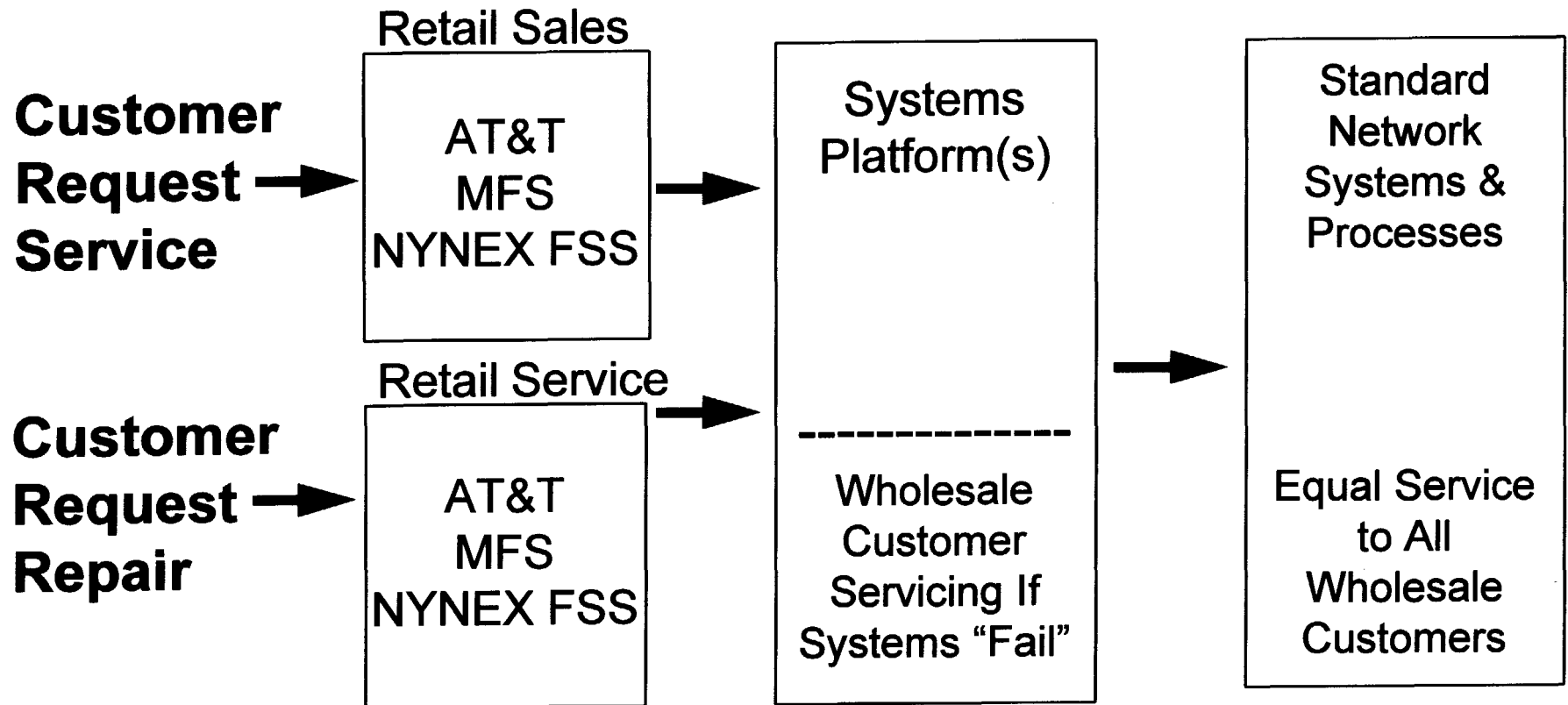
- **Be Easy to Do Business With**
 - Provide Mechanized Interface for Standard Requests
 - Work Collaboratively With New Customer Base
- **Be Desirable to do Business With**
 - Provide Quality, Timely Services
 - Be Responsive to Customer Requests

MAJOR UNDERLYING MIND SET CHANGE

- Resellers and CLECs are Customers of NYNEX Wholesale; Competitors of NYNEX Retail
- Employees in Wholesale Functions(Fallout, Dispatch, Network Centers, Field, Operator Services) Must Think of Resellers, CLECs & NYNEX Retail as Customers
- Employees In Retail Functions (HMC,GBSC, CSB, etc.)
Will Think of Resellers and CLECs as Competitors

GOAL: Individual Employees Think of Resellers / CLECs as Customer or Competitor, But Not Both -- Based on the Function They Perform.

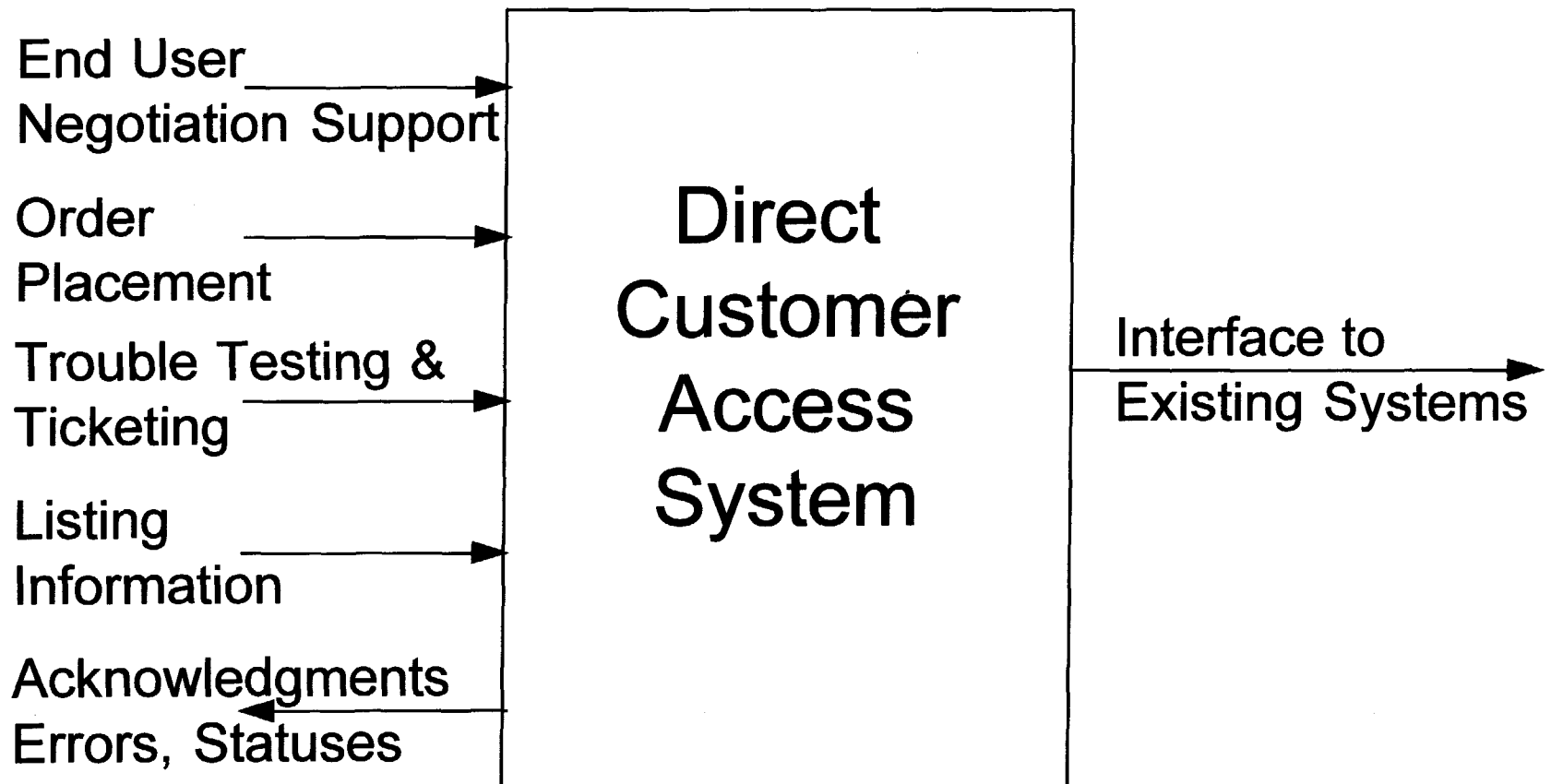
OPERATING MODEL



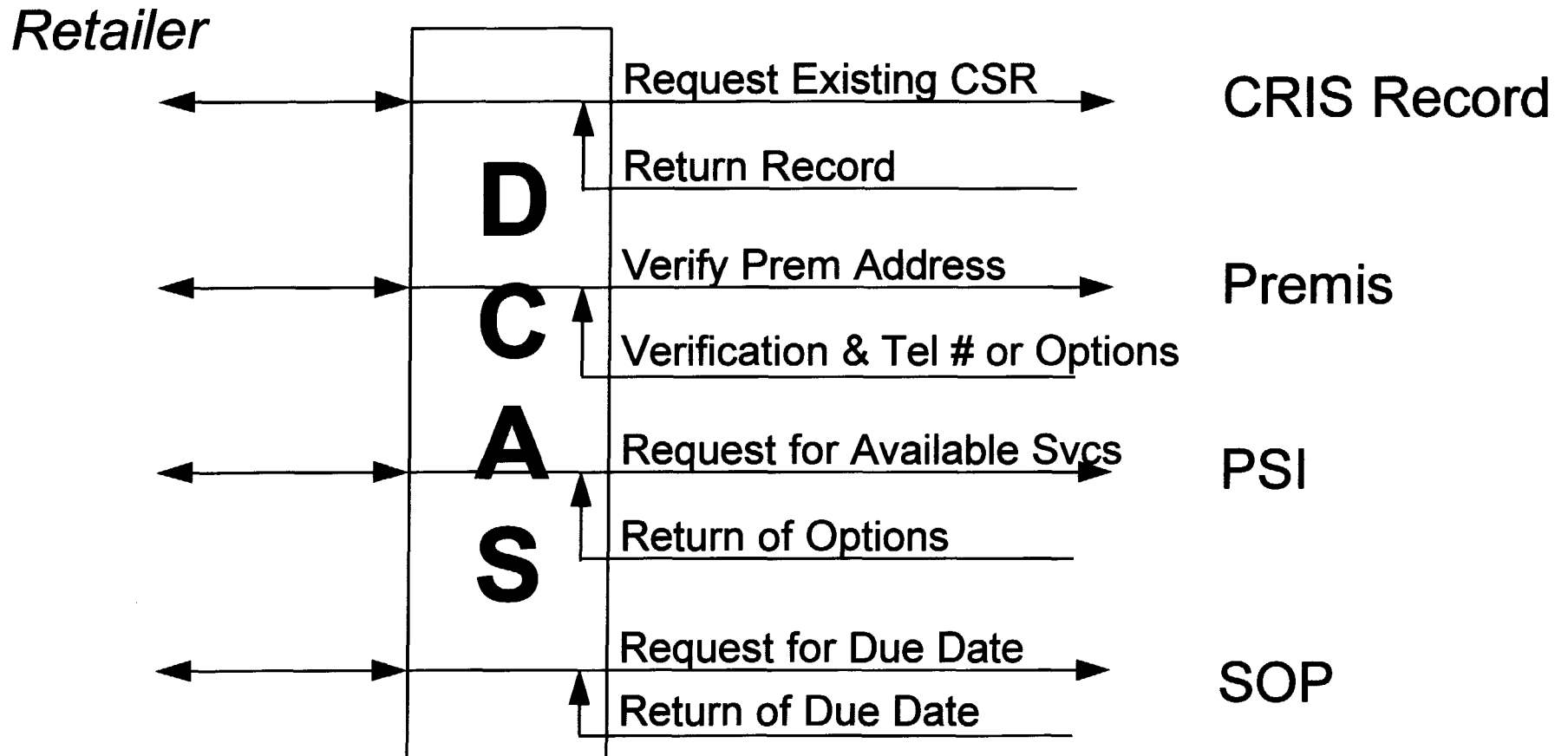
- End User Interfaces With Retail Customer Facing Units
- Retail CFUs Interface With NYNEX Wholesale Systems (With "Service Centers" For Low Volume or Complex Requests or Error Administration)
- NYNEX Wholesale Systems Support NYNEX Operations

MECHANIZED INTERFACE TO RESELLER / CLEC

Reseller / CLEC



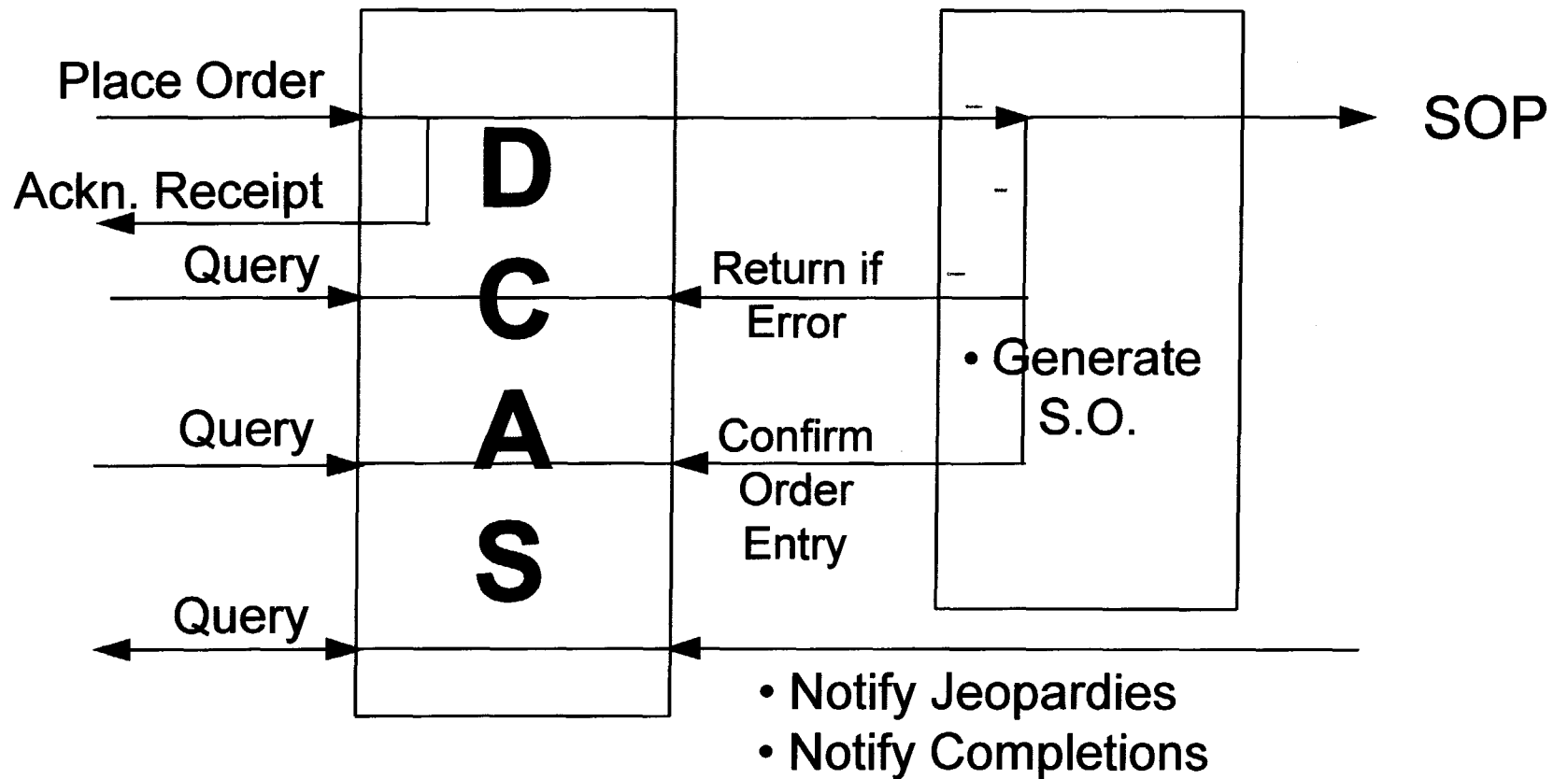
NEGOTIATION SUPPORT



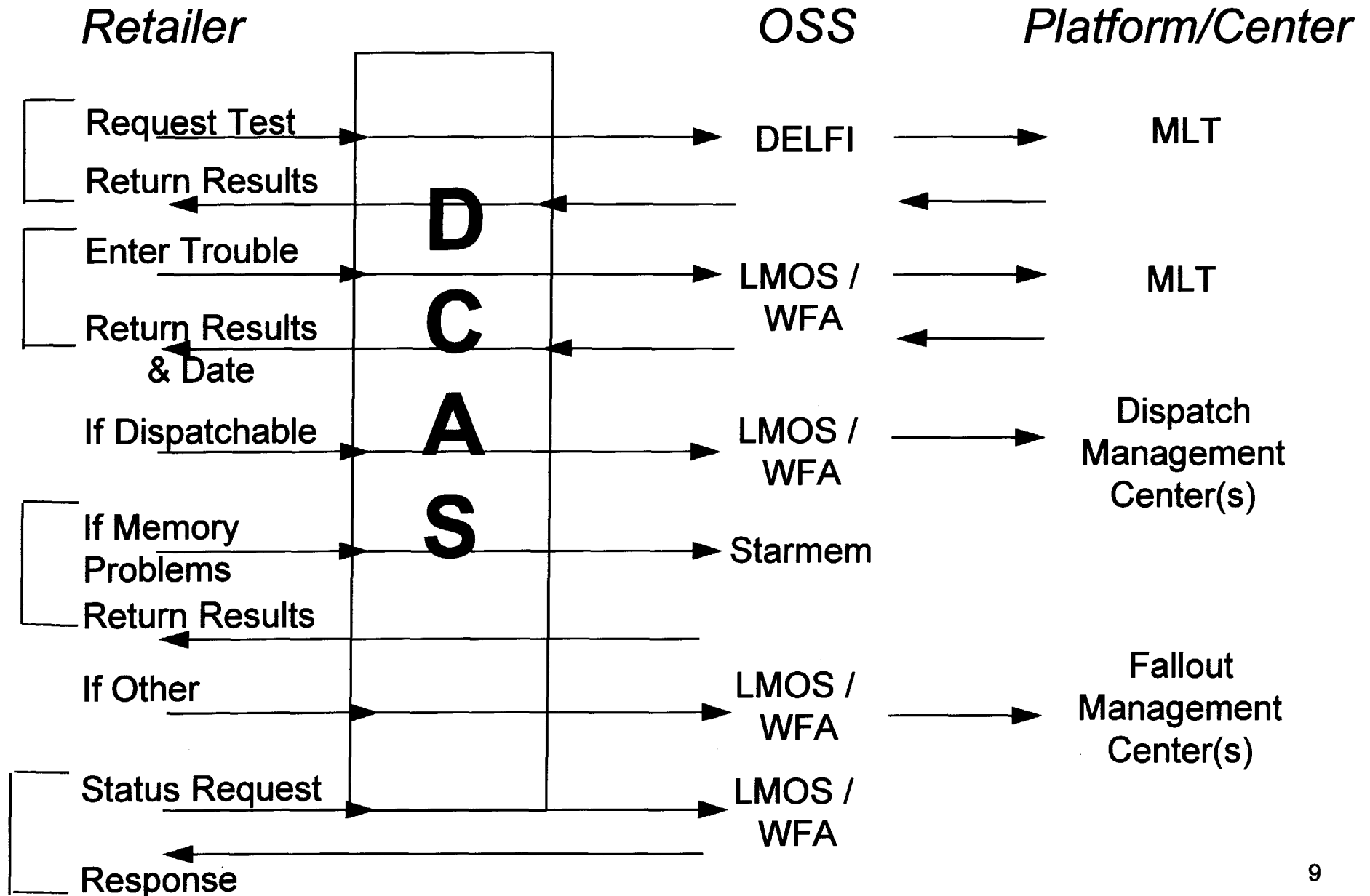
- Real-Time Interface
- Can Bundle Requests
- Several Levels of Security
- National Standards Where/When Exist

ORDER PLACEMENT

Retailer



TROUBLE PLACEMENT



KEY AREAS OF IMPACT

- Customer Contact
 - New Customer Base to Support
 - Mechanized Interfaces
 - All Large Customers
 - New Unbundled Services
 - Many Technical Issues
 - End User Confusion to Minimize
 - NYNEX Retail Customers
 - End User Calling Wrong Place
 - Slamming Issues
 - Winback Handling

CENTER IMPACTS

- New / Improved CLEC / Reseller Support Centers
- Business Office Support for Confused Customers
- Repair Bureau Support For Confused Customers
- Repair Fallout Support for Retailers
- New Trunking Arrangements & Interfaces
- New Failure Notification Processes
- New Facility Monitoring Arrangements & Interfaces

FIELD IMPACT

- **Serve All End Users - on Behalf of Retailers**
- **Retailer - not End User - Authorizes Additional Prem Work**
- **Demarc Info Required Back to Retailer**
- **Closeout With Retailer - Not End User**
- **More “Partial Service” and Vendor Meets**

CAPACITY PROVISIONING IMPACT

- Capacity Planning Has New Source Data (Retailers) - But They Are Not Required to Provide
- Capital Authorization Process More Akin to Service Order Process Timeframes
- Potential For Non-NYNEX Facilities into NYNEX Termination Points
- Switch Capacity Issues Relative to Many, Smaller Trunk Groups and Increased Potential For Feature Requests That Consume Great Switch Resources

BILLING IMPACTS

- New Unbundled Services with Complex Usage Rating
- New Resale Service Discounts and Account Structure
- New Usage Data to Support End User Billing by Reseller/ CLECs
- Many Settlement Issues
- Credit Information Sharing Issues
- Bulk Claims Processing

MECHANIZATION FLOWTHROUGH

Pre-Order for New York State

CLEC Orders

- 10/1
 - Full for SVGALS w/ or w/o INP
 - Full for Disconnects
 - Other Orders: Mechanized Order Placement; Manually Aided Creation, Statusing, Completion. Staffing to Support Timeliness
- Beyond
 - Continued Monthly (+/-) Releases to Complete Mechanization

Resale Orders

- 10/1
 - All Order Placement Mechanized
 - Service Order Creation, Statusing Completion Notification Will Be Manually Aided. Staffing to Support Timeliness
- 11/15
 - Full Flowthrough of Converted Orders W/ No Change Or Simple PIC/LPIC/CCS Changes and Notifications
- Beyond
 - Continued Monthly (+/-) Releases to Complete Mechanization

MECHANIZATION FLOWTHROUGH (cont)

Pre-Order for New York State

Pre-Order Negotiation

- 10/1 - On-Line Ability to:
 - Verify Feature Capability Per Switch
 - Verify Premises Address
 - Assign Telephone Number
 - Determine Due Date

Trouble Report Administration

- 10/1 - Issue Trouble Report Mechanically
- Verify Status
- EOY - Trigger Dialtone Service Test
- w/i Year - Trigger on-Line Feature Repair

Billing

- 10/1 - Receive End User Usage Billing Data
- Receive Monthly Bills For Resold Services & SVGALS
- Process Claims

SUBSTANTIVE ITEMS IN AUGUST ORDER

Not Previously Assumed or Planned in Detail

- Unbundled Switching Could Not Be Ports & Existing Usage Concepts (Local vs. Toll vs. Access)
- NYNEX Required to Combine Network Elements
- Customized Routing Required - Especially for Operator Services - Issue Larger on Resale
- OSSs to Be Treated As Network Elements With Non-Discriminatory Access Required by 1/1/97 (All Jurisdictions) - Had Not Planned New England Resale Until Staggered Schedule From March Through June
- LPIC Timing Parity Requirement
- Non-Discriminatory Branding/Unbranding of Operator Services
- Access to LIDB, 800, LNP, AIN, DA , SMSs
- Unbundled Tandem Switching & Unbundled Common Transport
- Integrated Loop Carrier and Digital Cross Connect System Issues
- Virtual Colocation
- Provision of NID As Unbundled Element

COMBINATION OF NETWORK ELEMENTS

- Having LECS Combine Unbundled Loops and Unbundled Switching Is Not Equivalent to Providing Traditional Bundled Dialtone
 - Ordering Options Are More Technical and Need Up-Front Negotiations For Routing Patterns Per Switch
 - AMA Recording Requirements Are Different
 - Must Order & Bill Network Elements With Selected Options. Must Provision and Maintain Like Customized Services. Need Mapping & Significant Methods and Systems Work to Have Downstream Systems Interpret As Familiar Things
 - Need to Define Respective Responsibilities: Maintain Elements (What Is Sold), or Maintain “Service” (What Is Provisioned)?

OSS ASSUMPTIONS

- Access Required to Operations Support System Functions, Not Necessarily the Systems Themselves
- Not Required to Provide Copies of Databases - Only Access to Their Content
- Access Must Provide Substantially the Same Quality and Timeliness As That Provided Internally
- Functions Requiring Support Are: Pre-Ordering, Ordering, Provisioning, Maintenance and Repair, and Billing
- Functions Supported Are Comparable to the Capabilities of Business Office and Repair Bureau Personnel - Not Internal Network or Engineering Personnel
- Current Manual Processes Need Not Be Mechanized - As Long As Comparable
- Customer Data Must Be Protected and Not Shared Among Retailers Without Customer Permission
- Access to Trouble History Only On Their Customers - Not as Preliminary Marketing Data
- Colocation at Data Centers is Not Required Just Because Network Element (OSS Database) is Located There

CURRENT OSS SCHEDULE

10/1/96

Mechanized Interface For NY Resale

- Pre-Ordering (Negotiation Support)
- Order Placement & Statusing
- Trouble Report Placement & Statusing
- Billing

Same Support For Unbundled Loops

1/1/97 - Targeted and Being Evaluated:

Add Remaining Unbundled Elements in All Jurisdictions

Add Resale in Remaining Jurisdictions

Increase Mechanized Service Order Generation For Higher Volume Requests

PLANNED SUPPORT

– Implementation

- Approximately 350 People Working Full-time - More to be Added to Implement New Requirements By 1/1/97
- Scarcity of Knowledgeable People

– Ongoing Support

- CLEC & Reseller Support Centers Augmented By 300 People - Specifics Flexible Based on Volume Expectations Once Prices Are Determined in Arbitration Cases and/or Tariff Filings

– Massive Training Efforts

- Videos
- Meetings
- Methods Flashes
- Formal Training

SUMMARY

- NYNEX Intends to Be The Network of Choice By Supporting Retailer Needs
- NYNEX-NY Is In The Forefront of Mechanization Due to 9 Months of Preparation and Industry Collaboration on Requirements - Resale & Unbundled Loops
- Capabilities to Support Unbundled Elements Are Expected To Be Common, Regardless of Jurisdiction - And Mechanized Support for Minimum Elements Targeted for 1/1/97 - But Very Ambitious
- Capabilities To Support New England Resale Are Being Targeted for 1/1/97 - But Very Ambitious
- NYNEX Intends to Comply - Significant Work Effort